

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

WILLIAM R. ROGERS,)
)
Plaintiff,)
v.)
)
GREGORY HACKER,) Case No.: 3:20-cv-01116-DWD
)
Defendant.)

MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS

Defendant GREGORY HACKER, by and through his attorney, Kwame Raoul, Attorney General for the State of Illinois, moves this Court for a 21-day extension of the dispositive motion deadline, up to and including January 13, 2023, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure. In support of his motion, Defendant provides the following:

1. On September 23, 2022, this Court extended the discovery deadline to November 22, 2022 and ordered that dispositive motions are to be filed by December 23, 2022. ECF 93.
2. The parties have completed discovery in this case, but Defendant needs additional time to file a dispositive motion due to undersigned counsel's workload.
3. The court may grant extensions of time that are requested before a deadline passes for good cause shown.
4. Undersigned counsel has a draft of a dispositive motion in this case, but needs additional time to complete it because of work in other cases to which she is assigned, including:
Guns Save Life v. Kelly, Sangamon County Case No. 19-CH-180, summary judgment motion filed December 2, 2022 and response to summary judgment due January 4, 2023;
Svendsen, et al. v. Pritzker, et al., USDC CDIL 22-1269, reply in support of motion to dismiss filed November 21, 2022, supplemental motion to dismiss filed December 6, 2022;
Rasho, et al. v. Jeffreys, et al., USDC CDIL 07-1298, reply in support of motion to dismiss

and response to request to produce with over 2,500 documents on December 16, 2022; *Gray, et al. v. Pritzker, et al.*, USDC CDIL 22-1342, motion to dismiss filed December 16, 2022; *Meyer, et al. v. Raoul, et al.*, USDC SDIL 21-518 dispositive motion deadline on January 6, 2023.

5. Judicial economy will also be served if the dispositive motion deadline is extended because it will limit the judicial resources spent on this case to proceed only on the claims for which there is a dispute of material fact, if any. Defendant intends to seek summary judgment as to each of Plaintiff's claims.
6. As outlined above, good cause exists to extend the dispositive motion deadline in this case to January 13, 2023, and to modify any other deadlines accordingly, such as the final pretrial conference and trial date.
7. When contact regarding this motion, Plaintiff's counsel stated he objects.

WHEREFORE, Defendant Gregory Hacker respectfully requests that this Court extend the dispositive motion deadline to January 13, 2023, and adjust any other deadlines accordingly.

December 21, 2022

Respectfully submitted,

GREGORY HACKER,

Defendant,

Laura K. Bautista, #6289023
Assistant Chief Deputy Attorney General
500 South Second Street
Springfield, Illinois 62701
Phone: (217) 782-5819
Fax: (217) 524-5091
E-Mail: laura.bautista@ilag.gov
gls@ilag.gov

KWAME RAOUL, Attorney General
State of Illinois,

By: s/Laura K. Bautista
Laura K. Bautista, #6289023
Assistant Chief Deputy Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2022, I electronically filed the foregoing ***Motion for Extension of Time to File Dispositive Motions*** with the Clerk of the Court using the CM/ECF system, which will send notification of same to the following:

Thomas G. Maag, #6272640
Maag Law Firm, LLC
22 West Lorena Ave
Wood River, IL 62095
tmaag@maaglaw.com

Respectfully submitted,

By: s/Laura K. Bautista
Laura K. Bautista, #6289023
Assistant Chief Deputy Attorney General